

3006958-GVC/af

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SABINE CAIN,)	
)	
Plaintiff,)	
)	
v.)	No. 08 Cv 2827
)	Judge Lefkow
AMERICAN AIRLINES, INC., a)	Magistrate Judge Cox
Corporation,)	
)	
Defendant.)	

PROPOSED SCHEDULING ORDER

The parties, having held a scheduling conference attended by Marc Alberts for the plaintiff and Gerald Cleary for the defendant, as required by Fed. R. Civ. P. 26(f), submit the following proposed scheduling order:

- (A) The parties believe that an early settlement conference ☐ will ☒ will not likely result in the disposition of the case.
- (B) The parties shall have until July 26, 2008 to make Rule 26(a)(1) disclosures.
- (C) The following amendments to the pleadings and/or joinder of additional parties are anticipated and may be sought upon appropriate motion by July 26, 2008. Amendments thereafter may be made only on motion for good cause shown.
- (D) Non-expert discovery will close on January 26, 2009.
- (E) The cut-off date for designation of plaintiffs trial expert(s) as provided in Fed. R. Civ. P. 26(a)(2) is February 28, 2009; for defendant's trial expert(s), April 28, 2009. Depositions of the experts shall be taken within 30 days of designation. Unless otherwise stipulated, disclosure of experts will include a report fully in compliance with Rule 26(a)(2)(B).
- (F) Any motion challenging the qualifications of a designated expert must be made within 21 calendar days after the deposition of the expert or the close of discovery, whichever is earlier. If no motion is filed, the court may deem such challenges waived.

Dispositive Motions

Before a dispositive motion is filed, the parties will exchange demand and offer letters in an effort to reach resolution of the case. A status hearing will be set on a date determined by the court, approximately two weeks before the close of discovery. At this time, the parties will report on any outstanding discovery issues, as well on the possibility of settlement and whether a settlement conference with a judge may be helpful. The parties should expect to be referred to a magistrate judge for settlement discussions before filing a motion for summary judgment.

Also at this status hearing, the court will set a schedule for disposition of the case, including trial dates.

Consent to Proceed Before a Magistrate Judge

The parties ☐ consent ☒ do not consent to have their case proceed before a magistrate judge. [Note: Forms for Transferring a Case to a Magistrate Judge can be found on the court's website.]

ENTER:

Date: _____

JOAN HUMPHREY LEFKOW
U.S. District Judge

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NOTICE OF FILING

TO: Smith & Alberts Ltd
6 W. Hubbard - #250
Chicago IL, 60610

Please take notice that on May 30, 2008, we filed with the Clerk of the U.S. District Court, 219 S. Dearborn, Chicago, Illinois the following:

Proposed Scheduling Order

a copy of which is hereby served on you.

/s/ Gerald Cleary 62001000
SmithAmundsen LLC
150 N. Michigan Avenue – Suite 3300
Chicago, IL 60601
Phone: (312) 894-3200
Fax: (312) 894-3210

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CERTIFICATE OF SERVICE

I hereby certify that on May 30, 2008, a copy of the foregoing **Proposed Scheduling order** was filed electronically and served by mail to:

Smith & Alberts Ltd
6 W. Hubbard - #250
Chicago IL, 60610

and on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing and a courtesy copy was hand delivered to the court as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Gerald Cleary, 62001000
SmithAmundsen LLC
150 N. Michigan Avenue – Suite 3300
Chicago, IL 60601
Phone: (312) 894-3200
Fax: (312) 894-3210